

# Exhibit F

IN THE GEORGIA STATE-WIDE BUSINESS COURT  
STATE OF GEORGIA

WELLS FARGO BANK, N.A., and WELLS  
FARGO DELAWARE TRUST COMPANY,  
N.A.,

Plaintiffs,

- against -

BRUCE ACHENBACH, NANCY BELSER,  
ANDREW COSTANZA, ANDREW DARROW,  
DAVID DARROW, JONATHAN DARROW,  
DEAN FLOCK, JAY GRIMM, JR., ROBERT  
KRAKOVITZ, MOSHE MALKA, LEON  
MALNIK, BARRY SEPTIMUS, and PHYLLIS  
SIFEN,

Defendants.

Civil Case No.

*Angie T. Davis*  
Angie T. Davis, Clerk of Court  
Georgia State-wide Business Court

**PLAINTIFFS' CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATE DISCLOSURE STATEMENT**

Plaintiffs Wells Fargo Bank, N.A. and Wells Fargo Delaware Trust Company, N.A. ("Plaintiffs"), by and through their attorneys of record and pursuant to Rule 2-2 of the Business Court Rules, file this Certificate of Interested Persons and Corporate Disclosure Statement.

- 1. The undersigned counsel of record for Plaintiffs certifies that the following is a full and complete list of each party to this action, including a parent corporation or publicly held corporation that owns ten percent or more of the stock of a party:**

- A. Plaintiff Wells Fargo Bank, N.A., which is a wholly-owned subsidiary of WFC Holdings, LLC. WFC Holdings, LLC is a wholly-owned subsidiary of Wells Fargo & Company. Wells Fargo & Company is a publicly held corporation (trading symbol: WFC).
- B. Plaintiff Wells Fargo Delaware Trust Company, N.A., which is a wholly-owned subsidiary of Wells Fargo Bank, N.A.

2. **The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in, or other interest that could be substantially affected by, the outcome of this particular case:**

- A. The Plaintiffs identified in response to Question No. 1, above.
- B. The Defendants, including:
  - i. Bruce Achenbach, as Heir of Walter Achenbach;
  - ii. Nancy Belser, as Heir of Dana Belser;
  - iii. Andrew Constanza, as Heir of Angelo Costanza;
  - iv. Andrew Darrow, David Darrow, And Jonathan Darrow, as Heirs of Stanley Darrow;
  - v. Dean Flock, as Heir of Henry Flock;

- vi. Jay Grimm, Jr., as Heir of Jay Grimm;
- vii. Robert Krakovitz, M.D., as Heir of Sylvia Hankin;
- viii. Moshe Malka, as Heir of Victor Malka;
- ix. Leon Malnik, as Heir of Abraham Malnik;
- x. Barry Septimus, as Heir of Helen Wilkenfeld; and
- xi. Phyllis Sifen, as Heir of Paul Sifen; and
- xii. Possibly other heirs and beneficiaries of the alleged Insured decedents identified above.

C. Liberty One Funding Trust and Liberty Two Funding Trust, Delaware statutory trusts, which are plaintiffs in the related case *Liberty One Funding Trust, et al. v. Bruce Achenbach, et al.*, Georgia State-Wide Business Court, Case No. 23-GSBC-0009, and also respondents in the *Achenbach, et al. v. Liberty One Funding Trust* arbitration before the American Arbitration Association, AAA Case No. 01-23-0004-4523.

**3. The undersigned further certifies that the following is a full and a complete list of all persons serving as attorneys for the parties in this proceeding:**

A. Attorneys for Plaintiffs:

Catherine G. Lucas  
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B. Attorneys for Defendants:

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Respectfully submitted this 1st day of December, 2023.

**DUANE MORRIS LLP**  
Attorneys for Plaintiffs

/s/ Terry R. Weiss

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## CERTIFICATE OF SERVICE

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This is to certify that I have this day served a true and correct copy of the foregoing **PLAINTIFFS' CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENT** upon all parties to this matter by electronically filing a copy of same with the Court's electronic filing system, which will automatically send an electronic copy to all counsel of record.

This 1st day of December, 2023.

Respectfully Submitted,

**DUANE MORRIS LLP**

/s/Catherine G. Lucas

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